

Whether documents “should be sealed . . . is a matter left to the sound discretion of the district court.” *Mann v. Boatright*, 477 F.3d 1140, 1149 (10th Cir. 2007). The presumption in favor of public access to judicial documents “may be overcome where countervailing interests heavily outweigh the public interests in access.” *Colony Ins. Co. v. Burke*, 698 F.3d 1222, 1241 (10th Cir. 2012) (internal citation and quotations omitted).

Vector Solutions has stated to Plaintiffs its objection to publicly filing any copies or screenshots of slides included in the training that Plaintiffs have in their possession because of its proprietary interest in the contents of the slides and the training materials. As such, Plaintiffs obtained a unique login for this Court to obtain virtual access to the training materials. Plaintiffs request leave to file the exhibit under seal to give the Court the opportunity to be able to access the Tulsa Public Schools training at issue in full.

Plaintiffs note that the Court previously granted a similar motion by Defendants [1-18] seeking leave to file under seal an exhibit containing certain of the slides for the Tulsa Public Schools training. *See* Dkts. 88, 89. The exhibit submitted by Defendants did not include all of the slides comprising the training. The exhibit that Plaintiffs seek to file under seal with this motion would provide the Court access to all the slides as well as the accompanying audio portion for the training.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2022, I electronically filed the foregoing Plaintiffs' Motion to For Leave to File Supplemental Papers with the Clerk of Court via the Court's CM/ECF system, which effects service upon all counsel of record.

Respectfully submitted,

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